

EXHIBIT 4

**TO PLAINTIFFS' MEMORANDUM IN
SUPPORT OF THEIR MOTION FOR
INJUNCTIVE RELIEF, INCLUDING ASSET
FREEZE, ACCOUNTING AND
REPATRIATION OF ASSETS**



Bank of America Legal Order Processing
 RE: Reference # U020215000210
 Court Case number: 13-2578-STA
 Court or Issuer: PIETRANGELO COOK PLC
 Court Case Name: MARY SLEDGE

AFFIDAVIT OF BANK OF AMERICA BANK OFFICER AND/OR CUSTODIAN OF RECORDS

Before me, the undersigned authority, personally appeared,
 Martin Graziano

Who, being duly sworn by me, deposes and says as follows:

1.) **Authority.** I, Martin Graziano, am a duly authorized bank officer and/or custodian of the records of Bank of America N.A with authority to execute this affidavit and certify to the authenticity and accuracy of the records produced with this affidavit.

2.) **Records.** The records produced herewith by Bank of America, N.A. are original documents or are true copies of records of a regularly conducted banking activity that:

a.) Were made at or near the time of the occurrence of the matters set forth by, or from

information transmitted by, a person with knowledge of those matters;

b.) Were made and kept in the course of regularly conducted banking activity by Bank of

America, N.A. personnel or by persons acting under their control; and

c.) Were made and kept by the regularly conducted activity of Bank of America N.A. as a

regular practice, on or about the time of the act, condition, or event recorded.

Additional Comments:

Rental Agreement and entry log for accounts ending in 3282, 3184, 1134 & 2597 in the name of Secured Assets Management Inc

Statements for account ending in 3214 in the name of Secured Assets Management Inc for a time period of 1/10 through 5/11

Statements, deposits, wires and signature card for account ending in 1096 in the name of Indico Systems Resources Inc for a time period of 6/12 through 1/15

Statements, checks, deposits, wires and signature card for account ending in 3991 in the name of Secured Assets Managements Inc for a time period of 1/08 through 4/11. Some items not available due to retention

Statements, deposits, and signature card for account ending in 3170 in the name of Dr Cleal T Watts III for a time period of 1/08 through 11/10. Some items not available due to retention

Statements, deposits, wires and signature card for account ending in 1106 in the name of Indico Systems Resources Inc for a time period of 6/12 through 1/15

3.) **Production.** (Select One)

☒ The records produced herewith (together with any banking records produced by Bank of America N.A. previously in response to the subject request, order, or subpoena) constitute a complete production of bank records responsive to the subject request order or subpoena (or a complete production under the terms of a subject request, order, subpoena as subsequently limited by the issuer).

OR

☐ A thorough search has been conducted and no records could be located that are responsive to the subject request, order, or subpoena.

4.) I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/13/15 Signature: [Signature]

The above named Bank of America N.A. bank officer and/or custodian of records is known to me (or satisfactorily proven) to be the person who subscribed the within document and acknowledged to me that he/she executed the same for the purposes stated there in.

☒ Signer is personally known to me.

☐ Signer has produced the following identification: _____

Sworn to and subscribed before me this 13th day of March 2015. In witness thereof I have set my hand and official seal.

[Signature]
 Signature of Notary Public in and for
 State of NY
 City/County of Utica/Oneida

SANDRA J. ALLEN
 Notary Public - State of New York
 No. 61AL6308494
 Qualified in Herkimer County
 Commission Expires July 28, 2017

BankofAmericaRDN02a 9/4/2012 11:15:58 AM PAGE 4/004 888-294-5658

TO:AR COMPANY:

MSB 488039131096

INDICO SYSTEM RESOURCES, INC.

8926 Forest Hills Blvd. Dallas, TX 75218; Tel: 214 659-2197; Email: indico@indico-system.com

RE: Company info and wire explanation

Dear Sir/Mam,

whm 8/15/2012

I hope this letter finds you well today. This letter is in response to the inquiry about our wires in and out of the account. In addition, tell you a little about our company. Indico Systems Resources (ISR) is a high tech firm. We manufacture computer equipment and controls systems for heavy machinery along with research and development. Family has been in construction and heavy earth moving for 118 years now. Notably projects like: Teddy Roosevelt called my great grandfather and great great uncle to do the moving the earth on the Panama canal; SAC runways at Shepard Air Force Base; the Mississippi, Illinois, and Trinity River Flood plain levees; Highways and Interstates IH-45, IH-30; as well as many State Roads (like TX 287) and Dams for the Corps of Engineers. The floods last year in the Illinois flood plains area were the levees held and they had to open the gates for the first time in 50 years to let the water out we, my family built.

ISR was started in Feb. 1996 as a high tech company, we are partners with; Micro Soft, Intel, AMD, NVidias, IBM, and many other companies. We also work on the design mostly computer, as well controls; electric, hydraulic, and mechanical for Earth Moving Equipment, contracted for other companies. Furthermore, we do any of the lab or chemistry work as needed for the Construction, Mining, and Manufacturing companies.

We have been consulting on and off for 30 years in West Africa and in the proses of opening operations in Sierra Leone for the last 5 years. Our offices our just about ready to move in. this is what has been causing us to have frequent wires back and forth. Things like, "Oh, you want electricity in your office all the time, you need a generator station then". Things do not move forward as fast in third world countries. Costs are more for some things and I will say much less for others. When to get what from where is how prudent business pays off in the long run.

Timing is working out about right over there. ISR is the lead company because technology is fastest on line. Cell phone companies were flying in the steel to build the cell towers to get a month jump on competitors on my trip 4 years ago. My hotel (650 beds & 20 businesses) shared a 128 ISDN network line, 2 1/2 times dial up speed. This last New Year when I was there they had a T1 about 8 times faster and G-4 WI-FI. November they will turn on our fiber optic, this is as fast as our server farms here in the US. ISR's offices will have been up and running by then with computers sales from the Dallas, TX office.

They also need infrastructure bad, this is where our construction company and manufacturing heavy earth moving equipment comes in. The contracts already look to be worth the effort we have made.

Since I have not had the time in Freetown were are offices are being finished, I was in surrounding countries the last few trips, our Corporate US Dollar Account for ISR, is titled as our managers name, Sheku Kondeh for security reasons. He is the signatory. Only he with his passport can access the account there without me. This will change next trip and accounts will be titled In ISR's name with appropriate security measures setup there in Freetown. So we can wire to same name accounts.



Dr. Cleal Watts III; CFO. ISR

Date: 14/08/2012

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Aug-14-2012 03:50 PM Bank of America 372-698-2166



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☒ Signer is personally known to me.

☐ Signer has produced the following identification: _____

Sworn to and subscribed before me this 13th day of March 2015. In witness thereof I have set my hand and official seal.

[Signature]
 Signature of Notary Public in and for
 State of NY
 City/County of Utica/Oneida

SANDRA J. ALLEN
 Notary Public - State of New York
 No. 61AL6308494
 Qualified in Herkimer County
 Commission Expires July 28, 2017



Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

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Statement Period
02/01/13 through 02/28/13
EO P PA 0A 50
Enclosures 0
Account Number 4880 3913 1096

023466

Bus Platinum Privileges


01099 001 SCM999 0

INDICO SYSTEM RESOURCES, INC.
PRIMARY ACCOUNT
8926 FOREST HILLS BLVD
DALLAS, TX 75218-4001

Our Online Banking service allows you to check balances, track account activity and more.
With Online Banking you can also view up to 18 months of this statement online.
Enroll at www.bankofamerica.com/smallbusiness.

Customer Service Information
www.bankofamerica.com

For additional information or service, you may call:
1.888.BUSINESS (1.888.287.4637)

Or you may write to:
 Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Deposit Accounts

Bus Platinum Privileges Relationship
Business Advantage Checking

INDICO SYSTEM RESOURCES, INC. PRIMARY ACCOUNT

Your Account at a Glance

Account Number	XXXX XXXX 1096	Statement Beginning Balance	\$1,682.88
Statement Period	02/01/13 through 02/28/13	Amount of Deposits/Credits	\$10,956.02
Number of Deposits/Credits	2	Amount of Withdrawals/Debits	\$6,455.80
Number of Withdrawals/Debits	62	Statement Ending Balance	\$6,183.10
Number of Deposited Items	0		
		Average Ledger Balance	\$3,013.67
Number of Days in Cycle	28		

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INDICO SYSTEM RESOURCES, INC.
PRIMARY ACCOUNT

Page 2 of 4
Statement Period
02/01/13 through 02/28/13
EO P PA OA 50
Enclosures 0
Account Number 4880 3913 1096

Deposits and Credits

Date Posted	Amount (\$)	Description	Bank Reference
02/04	1,000.00	BkofAmerica ATM 02/04 #000005274 Deposit Lakewood Dallas TX	950602040005274
02/19	9,956.02	Wire Type:Intl IN Date:130219 Time:0505 Et Trn:2013021500072304 Seq:Faas304600310000/005804 Orig:Sheku Kondeh ID:204/2041195/2/1/ Orig Bk:Guar Anty Trust Bank (SI) Ltd ID:Gtbislfir Pmt Det: \$28. 00 Fee Deduct/Transfer Of Funds Iro Refunds	903702150072304

Withdrawals and Debits

Other Debits

Date Posted	Amount (\$)	Description	Bank Reference
02/19	3,000.00	Wire Type:Wire Out Date:130219 Time:1305 Et Trn:2013021900334656 Service Ref:010178 Bnf:Bristol 5 Group Llc ID:4255816220 Bnf Bk:Td Ba Nk, NA ID:031201360 Pmt Det:95411338 Past Due Mont Hly Tech Fee	903702190334656
02/19	25.00	Wire Transfer Fee	903702190334656
02/28	29.95	Monthly Maintenance Fee	
Card Account # 4635 7200 1047 4789:			
02/01	173.30	CheckCard 0131 Amazon Mktplace Pmts	905701311105794
02/01	75.94	CheckCard 0131 Amazon Mktplace Pmts	905701311094660
02/01	46.00	CheckCard 0130 Domino's 6916	905701300972453
02/01	30.00	CheckCard 0131 Pingo.Com/Ibasis	905701311796205
02/04	947.00	CheckCard 0201 Asi Corp Dallas Da	905702011290366
02/06	36.90	CheckCard 0205 Paypal *hobbicolors	905702050791848
02/06	35.95	CheckCard 0205 Paypal *megasupersu	905702050791992
02/06	26.75	CheckCard 0205 Paypal *expertcompu	905702050791864
02/06	10.50	CheckCard 0205 Paypal *silicon Ele	905702050791880
02/06	8.99	CheckCard 0205 Paypal *bestofficep	905702050791890
02/06	4.99	CheckCard 0205 Paypal *double2Ink	905702050791986
02/06	3.50	CheckCard 0205 Paypal *reducecosti	905702050791925
02/06	2.90	CheckCard 0205 Paypal *lebest88	905702050791881
02/08	14.95	CheckCard 0208 SB *sav2Go8882725027	905702081869068
02/08	5.92	CheckCard 0207 Amazon Mktplace Pmts	905702070373751
02/08	2.90	CheckCard 0206 Paypal *bibershtain	905702060847887
02/11	126.76	CheckCard 0208 Trivita, Inc	905702080029155
02/11	2.38	CheckCard 0208 Amazon Mktplace Pmts	905702081278485
02/12	102.85	CheckCard 0211 Paypal *jesuslove24	905702110850596
02/12	82.06	CheckCard 0211 Amazon Mktplace Pmts	905702111213005
02/12	30.00	CheckCard 0211 Paypal *the Compute	905702110850547
02/13	21.98	CheckCard 0212 Amazon Mktplace Pmts	905702120549867
02/13	9.59	CheckCard 0212 Amazon Mktplace Pmts	905702120855582
02/13	8.99	CheckCard 0212 Amazon Mktplace Pmts	905702121158874
02/13	7.49	CheckCard 0212 Amazon Mktplace Pmts	905702120549704
02/14	25.23	CheckCard 0213 Amazon Mktplace Pmts	905702130642929
02/14	19.97	CheckCard 0213 Amazon Mktplace Pmts	905702130789782
02/14	17.95	CheckCard 0213 Paypal *wishourbaby	905702130829560
02/14	2.97	CheckCard 0213 Paypal *micromjn	905702130829552
02/19	106.46	CheckCard 0219 Williams-Sonomacatalog	905702191606813
02/19	13.85	CheckCard 0219 Williams-Sonomacatalog	905702191606809